

February 16, 2011

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW, Suite TW-A325 Washington, DC 20554

Dear Ms Dortch,

Enclosed you will find our annual CPNI Certification as required Under 47 C.F.R. – 64.2009, EB Docket No. 06-36.

If you have any questions, please contact me using the below listed information.

Regards,

Jerry L. Chapman

ACOMM Inc.

Phone: (763) 528-2401 Fax: (763) 528-2425

Attachment(s): ACOMM Inc. Statement on CPNI Compliance (2 pages)

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification

## **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2010

Date filed: February 17, 2011

Name of company(s) covered by this certification: ACOMM Inc.

Form 499 Filer ID: 803376

Name of signatory: Jerry L. Chapman

Title of signatory: President

I, Jerry L. Chapman, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Further, there has been no known access to or disclosure of CPNI by personnel without authorization. Also, there have been no instances of improper access to online information by individuals not authorized to view the information.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed Sung 2 Chapman

Attachment(s): Statement explaining CPNI procedures

## **ACOMM Inc. Statement on CPNI Compliance**

ACOMM Inc. is a very small company that provides telecommunication services to commercial customers only.

The Company has a Privacy Policy in place and associated internal procedures to direct the actions of the sales and customer service personnel. These specifically address the FCC regulations on protection and use of CPNI. Policies and Procedures include direction on the following:

- Privacy Statement
- Account ID and password generation and maintenance
- Notification of account changes
- Authentication and challenge requirements
- Valid use of CPNI
- Notification requirements for unauthorized CPNI disclosure

All personnel have had training on the CPNI policies and procedures and the issues that might arise in dealing with contacts from outside the Company that may require the use of CPNI. All new hire employees receive a copy of and are trained on the policies. Requirements are reviewed with personnel, by management, on a regular basis.

ACOMM Inc. does not use a call center for support of customers. Commercial accounts are supported by internal account representatives that correspond directly with customers. Also, ACOMM Inc. does not use call centers for the sale of telecommunication services.